

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

AMY CHAN, STEVEN WADE, and  
SHUNFENG CHENG,  
INDIVIDUALLY AND ON BEHALF  
OF ALL OTHERS SIMILARLY  
SITUATED,

Plaintiffs,

v.

NEW ORIENTAL EDUCATION &  
TECHNOLOGY GROUP INC., and  
CHENGGANG ZHOU,

Defendants.

No.: 2:16-cv-09279-KSH-CLW

CLASS ACTION

**NOTICE OF NON-OPPOSITION  
TO UNOPPOSED MOTION FOR  
PRELIMINARY APPROVAL OF  
CLASS ACTION SETTLEMENT**

Motion Day: July 6, 2020

Lead Plaintiffs Amy Chan, Steven Wade, Shunfeng Cheng and Elburn Irish (“Plaintiffs”) submit this notice of non-opposition to their Unopposed Motion for Preliminary Approval of Class Action Settlement, Docket No. 77 (the “Preliminary Approval Motion”). The Preliminary Approval Motion was filed on June 3, 2020 and noticed for the July 6, 2020 Motion Day. Thus, the deadline to oppose the Preliminary Approval Motion was June 22, 2020. To date, no opposition has been filed.

The Preliminary Approval Motion is therefore unopposed. As such, the Court should grant the Preliminary Approval Motion, so that notice of the settlement can be issued to Class Members and the settlement can proceed to the final approval

stage where the Court will weigh the merits of the settlement to determine whether the settlement is fair, reasonable, and adequate (the “Final Approval Hearing”).<sup>1</sup> Courts in the District of New Jersey regularly approve similar unopposed motions for preliminary approval expeditiously and without a hearing. *See e.g., Balon Agria Corporation, et al.*, Case No. 2:16-cv-08376-SDW-LDW (D.N.J.) (Dkt. No. 29); *Carmack, et al. v. Amaya Inc., et al.*, Case No. 1:16-cv-01884-JHR-JS (D.N.J.) (Dkt. No. 144); *Omanoff, et al., v Patrizio & Zhao LLC, et al.*, Case No. 2:14-cv-00723-MCA-LDW (D.N.J.) (Dkt. No. 53); *In re Akers Biosciences, Inc. et al.*, Case No. 2:18-cv-10521-ES-CLW (D.N.J.) (Dkt. No. 40).

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<sup>1</sup> As set forth in Plaintiffs’ brief in support of the Preliminary Approval Motion, the Court should set a date for the Final Approval Hearing to occur at least 120 days after the entry of an order granting the Preliminary Approval Motion (Dkt. No. 78, page 26). This will allow sufficient time for notices to be disseminated to class members, claim forms to be submitted, and for class members to file any objections or requests for exclusions.

Dated: July 1, 2020

Respectfully submitted,

**THE ROSEN LAW FIRM, P.A.**

By: /s/Laurence M. Rosen  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this July 1, 2020, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/Laurence M. Rosen